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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEPARTMENT OF TOXIC SUBSTANCES CONTROL	}	CASE NO. 12-cv-05845-VC	
Plaintiff,		STIPULATION AND ORDER CONTINUING EXPERT DISCOVERY DEADLINES	
vs.			
TECHNICHEM, INC.; et al.			Judge: Hon. Vince Chhabria
Defendant.			

Plaintiff, the Department of Toxic Substances Control (“DTSC”), and defendants Technichem, Inc.; Mark J. Ng; and Stephen S. Tung (collectively “Defendants”) hereby submit this Stipulation and Order Continuing Expert Discovery Deadlines.

The Court’s November 3, 2015 Minute Order (Dkt. No. 122) established the following schedule as it pertains to expert discovery:

- Initial expert discovery deadline is **May 2, 2016**
- Rebuttal expert discovery deadline is **May 23, 2016**
- Close of expert discovery is **June 27, 2016**

A Further Case Management Conference was held on March 22, 2016 whereby the Court’s Minute Order specified that the trial schedule remain as set.

(Dkt. No. 161). The remaining parties in this action have been engaging in extensive settlement discussions for the past several weeks, which are continuing. All parties believe it would be prudent to continue the expert discovery deadlines for a short period of time to allow the parties sufficient time to conclude settlement negotiations without incurring the substantial resources necessary for the preparation of initial and rebuttal expert reports. As the trial is not scheduled to begin until October 24, 2016, a short continuance of the expert discovery deadlines will not interfere with the currently scheduled trial date.

DTSC and Defendants, by and through their counsel, stipulate as follows:

1. The initial expert discovery deadline scheduled for May 2, 2016 will be continued to **May 16, 2016**.

2. The rebuttal expert discovery deadline scheduled for May 23, 2016 will be continued to **June 6, 2016**.

3. The close of expert discovery scheduled for June 27, 2016 will be continued to **July 1, 2016**.

4. The parties agree that all other dates/deadlines set forth in the Court's November 3, 2015 Minute Order (Dkt. No. 122) shall remain the same.

IT IS SO STIPULATED.

Dated: April 27, 2016

GORDON & REES LLP

By: /s/ Brian M. Ledger
 Brian M. Ledger
 Attorneys for Defendant
 STEPHEN S. TUNG

Dated: April 27, 2016

KAMALA D. HARRIS
 OFFICE OF ATTORNEY GENERAL

By: /s/Timothy E. Sullivan
 Harrison M. Pollak
 Timothy E. Sullivan

Attorneys for Plaintiff
DEPARTMENT OF TOXIC
SUBSTANCES CONTROL

Dated: April 27, 2016

NEXT LAW GROUP, APC

By: /s/ David R. Griffin
David R. Griffin
Attorney for Defendants
TECHNICHEM, INC. and
MARK J. NG

PURSUANT TO STIPULATION, IT IS SO ORDERED

April 29, 2016
Date



VINCE CHHABRIA
UNITED STATES DISTRICT JUDGE

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i), I hereby attest that I have on file records of e-mails showing that concurrence in the filing of this document has been obtained from each of the other signatories.

Dated: April 27, 2016

/s/ Brian M. Ledger
Brian M. Ledger

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